

# STAFF

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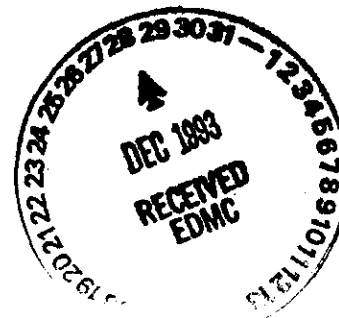
## DEPARTMENT OF ECOLOGY

August 3, 1993

TO: Toby Michelena  
Laurie Davies  
Tanya Barnett  
Bob Cordts  
John Grantham  
Moses Jaraysi  
Krystyna Kowalik  
Megan Lerchen  
Scott McKinney

FROM: Joe Witczak  
Nuclear and Mixed Waste Management Program

SUBJECT: Facility Wide Permit



I am providing each of you with the most recent version of the Facility Wide Permit for your review. It is not necessary for all of us to review the permit in its entirety, therefore, I have specified the sections I would like each of you to review. Your review should ensure that the Permit is grammatically, legally, and regulatorily correct as well as consistent with Ecology's and/or the Program's current policies and interpretations. In addition, Energy has submitted a new Facility Wide Permit Application dated May 28, 1993. Although we are not compelled to use or cite that document, you should review the applicable parts of the application relating to the permit section for which you have responsibility. This review may give us ideas about how to re-craft permit language to be more acceptable to Energy. The permit sections for each of you to review are as follows:

STAFF

Toby Michelena  
Laurie Davies  
Tanya Barnett  
Bob Cordts  
John Grantham  
Moses Jaraysi  
Krystyna Kowalik

PERMIT SECTIONS TO REVIEW

All  
Conditions II.K. and III.2.B.m.  
All  
Conditions III.2., III.4., & III.5.  
Definition "j." & Condition II.L.  
All  
Condition II.F.

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Megan Lerchen  
Scott McKinney

Conditions II.D., II.E., II.P. & III.1.  
Conditions II.A., II.B., II.C., II.M., II.O., & III.3.

Feel free to review any other sections of the Permit, as long as you can provide me your comments by August 11, 1993. At that time, I will give you the most recent version of the Responsiveness Summary to the public comments we received on the first draft of this Permit. I'll provide more details about that when the time comes.

The Department of Energy has only been provided select sections of this version of the permit. Those sections include: Signature Page, Table of Contents, Introduction, List of Attachments, Definition "j," and Conditions I.A.2., I.A.3., I.A.4., I.E.9., I.E.15, II.E., II.L.3., II.Q., II.T., II.U., II.V., and II.W.3. This is intended to keep Energy focused on the big issues, so please do not share any other sections with them. They will see the Permit in its entirety after I have incorporated your comments. This should be approximately August 18.

As an update, we will not be issuing a joint permit with EPA. Instead, the Facility Wide Permit (a.k.a. the RCRA Permit) will be composed of two separate permits. The first permit will be issued by Ecology and will address the RCRA core requirements including state-only conditions. The second permit will be issued by EPA and will address HSWA requirements including corrective action conditions. If and when Ecology receives authority to implement HSWA regulations, we will meld the two permits together.

Thanks for your time and consideration in this matter.

JW:dr  
Attachments

**FACILITY WIDE PERMIT ISSUANCE SCHEDULE**  
**July 29, 1993**

Brief Dru on Facility Wide Permit (Dave, Roger, Toby, Joe W., Dru's office, 2:30-3:30)	Jul 26, 93
Draft permit available for staff review (TA/SI, PI, Kennewick, and EPA staff, AAG, select sections to USDOE staff)	Jul 28, 93
Resp. summ. available for staff review	Aug 11, 93
Draft permit available for management review (Dru, EPA management, complete permit to USDOE)	Aug 18, 93
Draft resp. summ. available for management review	Aug 25, 93
Start of public comment period	Sep 15, 93
Public comment period ends	Nov 15, 93
Resp. summ. completed & permit issued	Jan 17, 94
Permit effective	Feb 16, 94